

21CA-CC00158

Notice and Acknowledgment for Service by Mail  
Circuit Court for Cass County  
Division 17

JUL 29 PM 2:  
FILED  
CIRCUIT CLERK  
CASS COUNTY MO.

Civil Action, File Number

Jeffrey M. Pearson "Pro Se"  
P.O. Box 193

Warsaw Mo 65355

Plaintiff

v/s. Retired J.P.  
06/26/2021

Amended

06/26/2021

City of Pleasant Hill Missouri

SGT Todd M. Burris "official capacity"

Prosecuting Attorney Jeremy Cover "official capacity"

~~Clines Auto Body~~ Louber Municipal Law, LLC

250 NE Tudor Road

Lee's Summit, Mo. 64086

(Clines Auto Body "Scott")

1107 Northines, Ln.

Pleasant Hill, Mo. 64086, Dominick Maleno official capacity,  
Defendant.

NOTICE AND ACKNOWLEDGMENT  
OF RECEIPT OF SUMMONS  
AND PETITION NOTICE

To: (City of Pleasant Hill Missouri, 203 Paul St. Pleasant Hill Mo. 64086

SGT Todd M. Burris, 203 Paul St. Pleasant Hill Mo. 64086

PA. Dominick Maleno, 203 Paul St. Pleasant Hill Mo. 64086

PA. Jeremy Cover, Louber Municipal Law, LLC 250 NE Tudor Rd. Lee's Summit Mo.

Clines Auto Body "Scott" 1107 Northines, Ln. Pleasant Hill Mo. 64086

Case 4:21-cv-00748-RK Document 1-2 Filed 10/11/21 Page 1 of 150

Exhibit 2

Circuit Court of Cass County  
Division 17  
State of Missouri

21CA-CC00158

21 JUL 29 PM 2:20

FILED  
CIRCUIT CLERK  
CASS COUNTY MN

Plaintiff

Jeffrey Michael Pearson

v.

Defendants

1. City of Pleasant Hill Missouri
2. Clines Autobody
3. Lauber Municipal Law LLC.
4. Jeremy Cover "Prosecuting Attorney" "official Capacity"
5. Sgt. Todd M. Burris "official Capacity" (Police Officer Pleasant Hill)
6. Police Officer Dominic Malena "Official Capacity" (Pleasant Hill).

Initial Petition

21 JUL 29

CIRCUIT COURT  
CASS COUNTY  
FILED 10/11/22 BY

# Petition

- I. 42 U.S.C. § 1983 - Unlawful Seizure, Detention, Search & Arrest (violations of First & Fourteenth Amendments to the United States Constitution & Comparable Portions of the Missouri Constitution);
- II. 42 U.S.C. § 1983 - Unreasonable & Excessive Force (Violations of the 4th Amendment to the U.S. & comparable Missouri constitution);
- III. Municipal & Supervisory Liability (Section 1983, the 4th Amendment to the U.S.C. & the Constitutional & Common Law of the State of Missouri);
- IV. Malicious Prosecution (4th Amendment to the U.S.C.);
- V. False Arrest (4th Amendment to the U.S.C.);
- VI. Retaliation in Violation of the First Amendment [42 U.S.C. Section 1983];
- VII. Assault & Battery (Pendent [Supplemental] claims of assault & battery under Missouri Law);
- VIII. Loss of Consortium (Pendent [Supplemental] Claim under Missouri State Law);
- VIII. Right to Due Process Clause (1st Amendment U.S.A. and comparable Missouri Constitution).

## X Intentional Infliction of Emotional Distress (Federal & State Claim)

Plaintiff seeks compensatory & Punitive damages, Any Court cost Legal fees & costs. Actual & Punitive Damages associated with the loss of a personal vehicle, Plaintiff seeks a trial by jury in all matters.

On November 4th 2017. Plaintiff had been walking his motor vehicle on the sidewalk of 7 highway headed south. Plaintiff put gasoline in the motor bike at Caseys General Store. 310 N. MO-7, Pleasant Hill, MO. 64080. Officer Malena initiated a citizen contact with Plaintiff. Plaintiff clearly stated that he did not wish to be contacted by Police Officer Dominic Malena. Officer Malena told Plaintiff he was free to leave. As Plaintiff was exiting the premises on foot Malena had called for back-up for unknown reasons of this time.

Sgt. Todd M. Burris arrived at the Caseys, as Plaintiff was leaving. Sgt. Burris drove past plaintiff walking the scooter on the side walk and pulled into Nicks Outfitters 210 MO-7, Pleasant Hill MO 64080. Approximately .1 miles or a 3m walk. See Attachment #1). The plaintiff was accused of driving on 7 highway in which Sgt. Burris

claims to have been searching for plaintiff.

SEE, Attachment #2 (incident report.)

Plaintiff immediately bought the dash cam the very next day.

"However, unless the video tape blatantly contradicts the allegations in the complaint, the court must still accept those allegations as true See Garcia v. Does, 764 F.3d 170 180 (2d Cir. 2014) citing Scott v. Harris, 550 U.S. 32 380 (2007); Bogic v. Rosenberg, 705 F.3d 603 609 (7th Cir. 2013) ("When an exhibit incontrovertibly contradicts the allegations in the complaint, the exhibit ordinarily controls even when considering a motion to dismiss.")

Plaintiff asserts that there is no truth to the allegations and Sgt. Burris had invented a pre-textual stop to conduct an illegal false arrest. The dash cam blatantly contradicts the incident report.

Plaintiff had showed these tapes to the municipal judge & Jeremy Cover. Plaintiff does not believe Todd M. Burris is immunity qualified. During said Municipal trial Plaintiff asked Todd Burris if he was familiar with Missouri racial profiling policy, in which Plaintiff had learned that was what Pleasant Hill uses for get downs for all officers. Sgt. Burris stated, "Yes"

Plaintiff more specifically asked if he was familiar with the rules of a citizen contact. He said he was, & that he was aware that Plaintiff did not have to comply & was free to leave. ~~This should~~ ~~free~~  
Therefore he knew what he was doing violated Plaintiff's rights but did it anyway.

Voiding Sgt. Burris of his immunity qualification.  
See Harlow v. Fitzgerald, 457 U.S. 800, 818 (1982).

Further more Plaintiff seeks to hold the city of Pleasant Hill accountable as well because Sgt. Burris actions were not isolated & have learned a man had died in his cell while in ~~&~~ Sgt. Burris custody. And his actions were done under a supervisory capacity in which he abused to teach Dominic Malena how to deal with citizens who fail to cooperate.

This is Doisness throughout the department therefore the city bears the litigation along with Sgt. Burris. In the video Sgt. Burris could not articulate why Plaintiff was to stop & throughout the dash cam & body camera tapes. It's quite clear that I was arrested for "Running my mouth" a clear violation of Plaintiff's 1st amendment rights.

Dashcam also reveals the reason Sgt. Burris (Continued on next page) See *Malena v. Shaffer*, 34 F.3d

(See Smith v. Wade, 461 U.S. 30, 56 (1983). Punitive Damages demonstrate that Burris' conduct was motivated by malice or evil intent, or acted with reckless or callous indifference to Plaintiffs Federally protected rights.

< The City of Pleasant Hill Missouri.

See Kentucky v. Graham 473 U.S. 591 165 (1985) where as an individual-capacity suit seeks to impose personal liability on a government official for actions taken under color of state law. An official capacity suit is the equivalent of an action against the governmental entity of which the officer is an agent.

Kimbillo v. Spreicher 434 F.3d 461 466 (6th Cir. 2006)

The Doctrine of qualified immunity shields government officials from liability for civil damages for actions taken in the scope of their duties, unless their conduct violates "clearly established statutory or constitutional rights, of which a reasonable person would have known." Harlow v. Fitzgerald 457 U.S. 800, 818 (1982)

See Garcia v. Does, 764 F.3d 170 180 (2d Cir. 2014) citing Scott v. Harris, 550 U.S. 372, 380 (2007) Boggs v. Parke, 705 F.3d 603 609 (7th Cir. 2013)

had his probable cause was cause of a broken tail light. The video captures the bike getting towed with a working tail light. This case was ultimately referred to a trial de novo in Cass County Missouri & Jeremy Caver after reviewing all of these said violations continued this quest to prosecute until the day of trial. The police were supposedly too difficult to reach. Plaintiff demanded that he get his bike free of charge from Clines' Autobody which Jeremy Caver agreed (See court CP) Plaintiff reached out to Scott of Clines Autobody & ~~was~~ "Scott" admitted to speaking with ~~me~~ Jeremy Caver about the scooter & insisted on charging me \$300.00 to get it out. Plaintiff seeks actual & punitive damages from Clines Auto for the loss of income due to not having a ride & the loss of freedom that comes with it.

(when an exhibit incontrovertibly contradicts the allegations in the complaint, the exhibit ordinarily controls even when considering a motion to dismiss.)

### City of Pleasant Hill MO.

names in his/her individual capacity (without the official capacity) Kentucky v. Graham 473 US 159 165 (1985) See Thorpe ex rel. DTU, Breathitt & Gray Bd. of Educ. 932 F Supp. 2d 799, 802 (E.D.Ky.2013)

See Adickes v. St. Kress & Co. 398 U.S. 144 (Sof 1970).

In determining the sufficiency of the allegations in a complaint a court may consider exhibits attached to a motion for judgement on the pleadings without converting to a motion for summary judgement so long as they are referred to in the complaint & are central to the claims contained therein.

Bassett v. Nat'l Collegiate Athletic Ass'n 528 F 3d 426, 430 (6th Cir 2008)

In Jones v. City of Cincinnati, the court held that even though a videotape of a police encounter could be considered in connection with a motion to dismiss, the district court was not required to do so where the videotape "captures any part of the incident & would provide substantial detail of the purpose of [Jones'] 521 F.3d at 562.

a supervisory official's failure to supervise, control or train the offending individual is not actionable unless the supervisor either encouraged the specific incident of misconduct or in some other way directly participated in it.

¶

Count IV: "Malicious Prosecution  
Violations of the Fourth Amendment  
to the U.S. C. as well as  
comparable provisions of the Missouri  
Constitution." /

Wallace v. Kato, 549 U.S. 384,  
390 (2007)

Malicious prosecution claim under 1983  
must prove that:

- (1) A criminal prosecution was initiated against me.
- (2) There was no prob. cause to support the criminal prosecution;
- (3) I suffered deprivation of liberty, apart from the initial seizure, and
- the criminal proceeding was resolved in my favor.

Mitchell v. Forsyth, 472 U.S. 511, 526  
(1985).

Saucier v. Katz, 533 U.S. 194, 206 (2001).

Ashcroft v. al-kidd, 131 S. Ct. 2074.

2085 (201) quoting

Malley v. Briggs, 475 U.S. 335, 341  
(1986)).

To determine whether a government official is entitled to qualified immunity we consider the two-part test described in Saucier v. Katz, which asks whether a constitutional right would have been violated on the facts alleged, & if so, whether the right was clearly established, 533 U.S. 194, 2006, 121 S.Ct. 2151, 150 L.Ed.2d 272 (2001).

We are free to address the second question first, analyzing whether the constitutional right purportedly prohibited a defendant's conduct

was clearly established, without addressing whether there was a constitutional violation at all. *Pederson v. Colfahan*, 555 U.S. 223, 236, 129 S.Ct. 808, 172 L.Ed.2d 565 (2009).

*Occupy Nashville v. Hastom*,  
769 F.3d 434, 442  
6<sup>th</sup> Cir. 2014.

Arrest without probable cause constitutes an unreasonable seizure in violation of the Fourth Amendment. <sup>¶</sup>

*Ingraham v. City of Columbus*, 185 F.3d 579, 592-93 (6<sup>th</sup> Cir. 1999) "Probable cause to justify an arrest means facts & circumstances within the officer's knowledge that are sufficient to warrant a prudent person, or one of reasonable caution, in believing, in the circumstances shown, that the suspect has committed, is committing, or is about to commit an offense." *Michigan v. DeFillippo*, 443 U.S. 31, 7 (1979)

courts normally look to state law defining the offense. Id. at 36 ("To determine whether an officer had probable cause to arrest someone for violation of a state statute, courts normally look to state law defining the offense. Id. at 36 ("Whether an officer is authorized to make an arrest ordinarily depends, in the first instance, on state law"). See also *Ingram*, 185 F.3d at 594 ("To determine whether officers had probable cause to arrest an individual, we must look to the law of the jurisdiction at the time of the occurrence.")

At issue here is whether PO had probable cause to arrest for failing to comply.

A) Missouri law provides as follows:

As the Supreme Court held, "a defendant cannot be said to have violated a clearly established right unless the rights contours were sufficiently definite that any reasonable official in the defendant's shoes would have understood that he was violating it." Plumhoff v. Rickard, 134 S.Ct. 2012, ~~2013~~ 2023 (2014) (citing

Ashcroft v. al-Kidd, 131 S.Ct. 2074 2083-84 (2011)). An officer is entitled to qualified immunity unless existing precedent "placed the statutory or constitutional question" confronted by the official "beyond debate." Id. The "crucial question is whether the official acted reasonably in the particular circumstances that he/she faced."

Court 11: '42 USC § 1983-  
Unreasonable & Excessive Force Violations  
of the Fourth Amendment to the United  
States Constitution, as well as  
comparable portions of the Ohio  
Constitution)

Slusher v. Carson, 540 F.3d 449,  
453-54 (6th Cir. 2008).

(1989), Graham v. Connor, 490 U.S. 386

Clearly established right to be free from  
the use of gratuitous violence during  
the course of the arrest.

See Shreve v. Jessamine Cnty. Fiscal  
Court, 453 F.3d 681, 686 (6th Cir. 2006).

"Cases in this circuit clearly establish the  
right of people who pose no safety  
risk to the police to be free from  
gratuitous violence during arrest.)

3. Count III: "Municipal & Supervisory Liability (Section 1983, the Fourth Amendment [ ] to the United States Constitution & the Constitutional & Common law of the State of Missouri)"

A municipality cannot be held liable under § 1983 merely because it employs an individual who engages in unconstitutional conduct. Rather, plaintiffs must prove that a policy or custom of the municipality was the "moving force" behind the alleged constitutional violation.

Monell v. Dept. of Soc. Serv.,  
436 U.S. 658, 694 (1978),

Such a policy or custom may consist of:

"(1) the municipality's legislative enactments or official agency policies;

(2) Actions taken by officials with Final Decision Making Authority;

a policy of inadequate training or supervision;  
a custom of tolerance or acquiescence of

federal rights violations."

Thomas v. City of Chattanooga,  
398 F.3d 426, 429 (6<sup>th</sup> Cir. 2005).

Plaintiff allege that inadequacy of supervisory/training was the result of deliberate indifference.

In Gannick v. Thompson, 131 S. Ct. 1350 (2011), the Supreme Court noted that "a municipality's culpability for a deprivation of rights is at its most tenous where a claim turns on a failure to train."

The failure to train must amount to a "deliberate indifference" to the rights of persons with whom the [untrained employers] come into contact. Id. at 1359 (citing Canton v. Harris, 489 U.S. 378, 388 (1989)).

Plaintiff must allege facts sufficient to show that there was a clear & persistent pattern of unconstitutional conduct.

demonstrating that the municipality had ignored a history of abuse & was clearly on notice that training in this particular area was deficient & likely to cause injury)

D'Ambrosio v. Marino, 747 F.3d  
378, 387. (6<sup>th</sup> Cir. 2014).

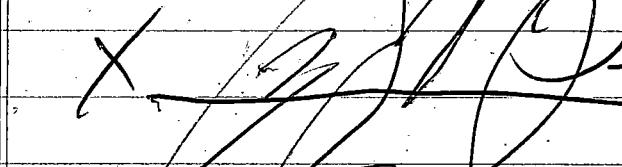
that there was a pattern of inadequately investigating similar claims.  
Burgess, 733 F.3d at ~~478~~ 478.

(Shehee v. Luttrell 199 F.3d 295, 300  
(6<sup>th</sup> Cir. 1992)

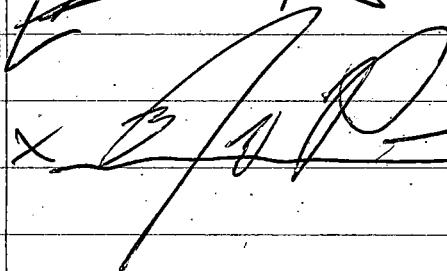
McQueen v. Beecher Community Schools,  
433 F.3d 460 (6<sup>th</sup> Cir. 2006)

Hays v. Jefferson County 668 F.2d 869  
874 (6<sup>th</sup> Cir. 1982)

Under Penalty of Perjury I swear to the  
facts contained therein to the best of my knowledge

X 

06/26/2021

~~Notary~~ 

7/29/2021

## Exhibit List

- A) Dash Cam
- B) Incident Reports
- C) Missouri Racial Profiling (packet)
- D) Radio Dispatch
- E) Maps of Pleasant Hill
- F) Digital Recorder (Audio)
- G) Emails to Casey's General
- H) Booking CD (audio/visual)
- I) CD (trial de novo)
- J) Motion to Suppress Evidence



IN THE 17<sup>th</sup> JUDICIAL CIRCUIT COURT, Harrisonville, MISSOURI

21CA - CCOO158

Judge or Division:	<u>17</u>	Case Number:	<u>19CA-CCOO285</u>
Petitioner:	<u>Jeffrey M. Pearson</u>	Petitioner's Address/Telephone:	<u>403 E. Broadway Street Jerico Springs MO 64756 (660)223-8759</u>
vs.		Respondent's Address/Telephone:	<u>203 Paul St. Pleasant Hill MO 64080</u>
Respondent:	<u>city of Pleasant Hill Et Al</u>		

21 JUL 29 PM 2:20  
FILED  
CIRCUIT CLERK  
CASS COUNTY, MO

(Date File Stamp)

**Motion and Affidavit in Support of Request to Proceed As a Poor Person**

Marital Status:	If Married, Spouse's name:	Number of dependents:
-----------------	----------------------------	-----------------------

(Include Spouse's Income and Expenses if Married)

**Monthly Income**

Gross salary (before deductions)	\$ <u>794.00</u>
Public assistance	\$ _____
Retirement/Pension	\$ _____
Social Security	\$ <u>744.00</u>
Child Support	\$ _____
Maintenance	\$ _____
Other income to be considered	\$ _____

**Monthly Expenses**

<input type="checkbox"/> Mortgage	<input checked="" type="checkbox"/> Rent Payment	\$ <u>400 monthly</u>
Utilities		\$ <u>300 monthly</u>
Food		\$ <u>"food stamps" 194</u>
Payment on debts & credit cards		\$ _____
Child Support		\$ _____
Maintenance		\$ _____
Medical expenses to be considered		\$ _____

Total Monthly Income

\$ 794

Total Monthly Expenses

\$ 700

**Assets**

Cash on Hand	\$ <u>0</u>
Bank Accounts:	
Checking	\$ <u>0</u>
Savings	\$ <u>0</u>
Approximate value of home	\$ <u>0</u>
And/or other real estate	\$ <u>0</u>
Approximate value of automobile(s)	\$ <u>5723.00</u>
(1) yr/make <u>2005/caravel</u>	
(2) yr/make _____	

**Debts**

Home loan balance	\$ _____
Automobile loan(s)	\$ <u>5723.00</u>
Credit card balance(s)	\$ _____
Other debts to be considered	\$ _____

Approximate value of personal

Possessions (list)

\$ _____
\$ _____
\$ _____

Total Assets

\$ 5723.00

Total Debts

\$ 5723.00

I swear/affirm under penalty of perjury that these facts are true to my best knowledge and belief.

7-29-2021

Date

Your Signature



# Social Security Administration Benefit Verification Letter

Date: May 13, 2021  
BNC#: 21HS123G78751  
REF: DI

# 000002348 I=000000 0513 BEVE 96S  
23461 MB 0.447  
 JEFFREY MICHAEL PEARSON  
PO BOX 193  
WARSAW MO 65355-0193

\*0101R33CQ002372\* CCM.M72.BEV3P.R210513

You asked us for information from your record. The information that you requested is shown below. If you want anyone else to have this information, you may send them this letter.

## Information About Supplemental Security Income Payments

Beginning April 2021, the current Supplemental Security Income payment is \$794.00.

This payment amount may change from month to month if income or living situation changes.

Supplemental Security Income Payments are paid the month they are due.

(For example, Supplemental Security Income Payments for March are paid in March.)

We found that you became disabled under our rules on March 14, 2016.

## Type of Supplemental Security Income Payment Information

You are entitled to monthly payments as a disabled individual.

## Date of Birth Information

The date of birth shown on our records is April 4, 1984.

## Suspect Social Security Fraud?

Please visit <http://oig.ssa.gov/r> or call the Inspector General's Fraud Hotline at 1-800-269-0271 (TTY 1-866-501-2101).

See Next Page

**If You Have Questions**

We invite you to visit our web site at [www.socialsecurity.gov](http://www.socialsecurity.gov) on the Internet to find general information about Social Security. If you have any specific questions, you may call us toll-free at 1-800-772-1213, or call your local office at 1-877-405-5459. We can answer most questions over the phone. If you are deaf or hard of hearing, you may call our TTY number, 1-800-325-0778. You can also write or visit any Social Security office. The office that serves your area is located at:

SOCIAL SECURITY  
3404 W 10TH  
SEDALIA MO 65301

If you do call or visit an office, please have this letter with you. It will help us answer your questions. Also, if you plan to visit an office, you may call ahead to make an appointment. This will help us serve you more quickly when you arrive at the office.

*Social Security Administration*



IN THE 17<sup>th</sup> JUDICIAL CIRCUIT COURT, County of Cass Harrisonville MISSOURI  
21CA-CC00158

Judge or Division: <u>17</u>	Case Number: <u>19CA-CC00288</u>
Petitioner: <u>Jeffrey M. Pearson</u> vs. <u>City of Pleasant Hill</u>	Petitioner's Address/Telephone: <u>403 E. Broadway St.</u> <u>Terric Springs Mo. 64756 (660)223-8759</u>
Respondent: <u>Ct Al</u>	Respondent's Address/Telephone: <u>203 Paul St.</u> <u>Pleasant Hill Mo. 64080</u>

(Date File Stamp)

### Order to Proceed As a Poor Person

- The Court, having considered the Motion and Affidavit in Support of Request to Proceed as a Poor Person, finds that \_\_\_\_\_ is without sufficient funds or assets with which to pay the advance deposit for costs in this action and, therefore, is granted leave to proceed as a poor person and the required advanced deposit for costs is waived.
- The Court, having considered the Motion and Affidavit in Support of Request to Proceed as a Poor Person, finds that \_\_\_\_\_ has sufficient funds or assets with which to pay the advance deposit for costs in this action, and therefore, the Motion is denied.

\_\_\_\_\_

\_\_\_\_\_  
Commissioner/Judge



In the 17th Judicial Circuit Court 21CA-CC00158  
County of Cass Harrisonville, MO, Missouri

Petitioner

Jeffrey M. Pearson  
403 E. Broadway St.  
Jerico Springs MO  
64756

Case# 19CA-CC00285

21 JUL 29 PM 2:20

FILED  
CIRCUIT CLERK  
CASS COUNTY MO

v.  
City of Pleasant Hill  
et al

~~Plaintiff~~ Plaintiff wishes to have  
summons be delivered by Sheriff upon  
approval of THE COURT.

comes now Plaintiff hereby wishes the  
defendants in the above case to be served  
any summons/ documentation concerning said case  
to be delivered by Sheriff of Cass County Missouri  
as prescribed by law.

Plaintiff  
Jeffrey Michael Pearson

X

JP  
7/16/21

Circuit Court of Cass County  
DIVISION F

Plaintiff Jeffrey Michael Pearson  
PLAINTIFF

RECEIVED 7/16/2021

JP 7/16/21

Amended

Scott Cline's Auto Body

Case # 19CA-C00285

DEFENDANT

JP 7/16/21

Owner/Lienholder Petition for  
Property Release

RECEIVED 7/16/21  
AMERICAN  
TITLE  
CLERK  
PM

21CA-C00158

Comes Now Plaintiff Jeffrey M. Pearson  
in the matter of case no. 19CA-C00285  
hereby moves this court to release the  
property held at Cline's Auto Body Shop  
at 1107 Northes, Ln. Pleasant Hill Mo. 64080  
And has such illegally detained such property  
that is owned by the petitioner.  
That being said property is as follows  
Year 2010 Model

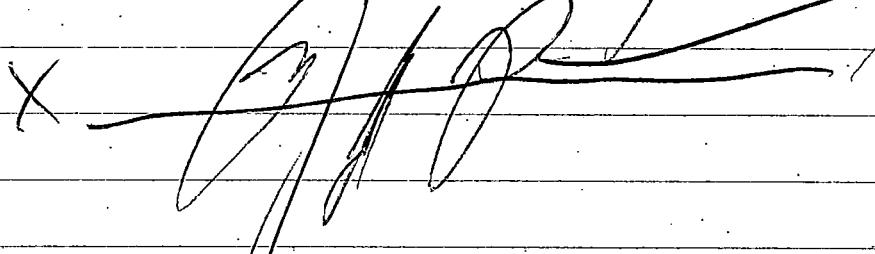
Petitioner states that on or about Nov  
4th 2017 Cline's Auto Body took possession  
of Plaintiff's property through police force  
after distress. Plaintiff states that Cass County  
Circuit Court under the honor able Judge  
of Prosecutor Jeremy Gove of

was & can be cross examined by CP  
audio of such hearing - In which the  
plaintiff & Prosecutor made a verbal  
contract in front of ~~SAC~~<sup>magistrate</sup> court and  
while under OATH. The contract consist of  
of Plaintiff worried about getting his  
scooter/motorbike back since such case  
had been dismissed. The PA Jeremy Cover  
stated "I'll take care of it."

Plaintiff spoke to "Scott" at Cline's Auto  
Body & he claimed to have spoken with  
Jeremy Cover, but insisted it would  
cost Plaintiff \$250-\$350.

Plaintiff is innocent & has made  
a binding contract with Jeremy Cover.  
If Jeremy Cover does not possess such  
powers to release property Plaintiff prays  
that the court will.

I swear under penalty of perjury  
the statements in this motion are  
true to the best of my knowledge.

X 

Medicine affects me

1-16-2021

**EXHIBIT B #1**

Case 19 CT-CG-028  
Plaintiff: Jeffrey M. Parson

103 E Broadway  
Jenice Springs MO.

660/223-8229  
64252

Defendant:  
Glines Auto Body  
107 Mathes Ln  
Pleasant Hill MO.  
64070  
**Nexium®**  
(omeprazole magnesium)

**CERTIFICATE OF ORIGIN FOR A VEHICLE**

TAOTAO USA INC

DATE 06/15/2015

VEHICLE IDENTIFICATION NO L9NTELKD8D1081606

BODY TYPE SCOOTER

H P (S.A.E.) 149CC G V W F 230 LBS

NO CYLS. ONE

SERIES OR MODEL POWERMAX 150

MAKE TAOTAOCHINA

SHIPPING WEIGHT 250 LBS

INVOICE NO 159099

I, the undersigned authorized representative of the company, firm or corporation named below, hereby certify that the new vehicle described above is the property of the said company, firm or corporation and is transferred on the above date and under the invoice Number indicated to the following distributor or dealer.

NAME OF DISTRIBUTOR, DEALER, ETC

THIS VEHICLE CONFORMS TO ALL APPLICABLE FEDERAL MOTOR VEHICLE SAFETY STANDARDS AND ENVIRONMENTAL PROTECTION AGENCY REQUIREMENTS IN ACCORDANCE WITH THE NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION  
50 HIGHWAY CYCLE  
1459 NW US HWY 50  
HOLDEN, MO 64040

It is further certified that this was the first transfer of such new vehicle in ordinary trade and commerce.

TAOTAO USA INC.

BY \_\_\_\_\_  
(SIGNATURE OF AUTHORIZED REPRESENTATIVE)

(AGENT)

Dallas, TX

CITY - STATE

186396



NOTICE OF ENTRY  
(SUPREME COURT RULE 74.03)

In The 17th Judicial Circuit Court, Cass County, Missouri

CASS COUNTY JUSTICE CENTER, 2501 WEST MECHANIC, HARRISONVILLE, MISSOURI 64701

JEFFREY M PEARSON V CITY OF PLEASANT HILL ET AL

CASE NO : 21CA-CC00158

To: File

YOU ARE HEREBY NOTIFIED that the court duly entered the following:

Filing Date      Description

09-Aug-2021      Notice of Court Hearing Sent

Hearing Scheduled

Court sets case for an in person hearing on September 7, 2021 at 2:30 pm

Scheduled For: 07-Sep-2021 2:30 PM; WILLIAM B COLLINS; DIVISION I COURTROOM; Cass  
IN PERSON HEARING

Event Location: Cass County Justice Center, 2501 West Mechanic, Harrisonville, Mo



\_\_\_\_\_  
Clerk of Court

CC:      File  
        JEFFREY M PEARSON

ECC:

Date Printed : 09-Aug-2021

Sep. 7<sup>th</sup> 2021

17<sup>th</sup> Judicial Circuit Court,  
Cass County, Missouri & Harrisonville, Mo.

Plaintiff:

Jeffrey M. Pearson  
403 E. Broadway St.,  
Jerico Springs Mo.  
phone# (660) 223-8259 64756

v.

Case No: 21CA-CC00158

21 SEP - 7 PM 3:40

FILED  
CIRCUIT CLERK  
CASS COUNTY, MO

Defendant:  
City of Pleasant Hill Missouri

ET AL

~~Attn~~ Request for summons  
via certified mail.

X 



page 1 of 3

17th Judicial Circuit Court  
Cass County State of Missouri.

Case No: 21CA-C0058

Filed Sept. 7 2021

21 SEP -7 PM 3:53

FILED  
CIRCUIT CLERK  
CASS COUNTY, MO.

Plaintiff:  
Jeffrey M. Pearson  
403 E. Broadway St.  
Jerico Springs, MO.  
64756  
(660)223-8759

v.

Defendant:  
City of Pleasant Hill  
et-al "CLINES AUTOBODY"

Motion to force the release  
of property rightfully owned by  
the Plaintiff & illegally detained  
by the Defendant "Clines Auto Body"

COMES NOW; Plaintiff prays that this  
court through the honorble judge William



Page 28  
Collins will grant relief to plaintiff  
in that Clines Auto Body has been in  
possession of Plaintiff's motorcycle for  
over a period of over 4 years. In  
doing so Defendant has left the  
plaintiff at a serious disadvantage in  
society as he is disabled ~~not~~  
able to make many doctor & appointments  
& was unable to care for himself  
without HB transportation. Plaintiff  
was impatient in that he was unable  
to move the court with more  
confidence & Plaintiff only just now  
has become as mobile as he was  
when Clines Auto Body came into  
possession of Plaintiff's transportation.  
Plaintiff has made several attempts to  
retrieve his bike & was sent away  
empty handed or sometimes "Scott"  
would say Plaintiff owed \$300.00  
and would have to pay the

pp3<sup>rd</sup>) sum in full in order to leave with  
his bike. Plaintiff properly refused  
as according to Missouri Law  
When a defendant in a case has  
the entire case dismissed any  
debts incurred by the case  
itself must be paid for by  
the party that did NOT prevail.

September 7<sup>th</sup> 2021

Plaintiff Jeffrey M. Pearson

X ~~Jeffrey M. Pearson~~

I swear under penalty of perjury that the  
above facts are all true to the best of my knowledge.



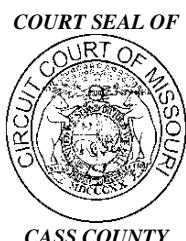
# IN THE 17TH JUDICIAL CIRCUIT COURT, CASS COUNTY, MISSOURI

Judge or Division: <b>WILLIAM B COLLINS</b>	Case Number: <b>21CA-CC00158</b>
Plaintiff/Petitioner: <b>JEFFREY M PEARSON</b>	Plaintiff's/Petitioner's Attorney/Address:  vs.
Defendant/Respondent: <b>CITY OF PLEASANT HILL</b>	Court Address: Cass County Justice Center 2501 West Mechanic <b>HARRISONVILLE, MO 64701</b>
Nature of Suit: <b>CC Other Miscellaneous Actions</b>	(Date File Stamp)

## Summons for Service by Registered or Certified Mail

**The State of Missouri to:** **CITY OF PLEASANT HILL**  
Alias:

**CITY HALL  
203 PAUL  
PLEASANT HILL, MO 64080**



You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the Plaintiff/Petitioner, or Plaintiff/Petitioner, if pro se, at the above address all within 30 days after the return registered or certified mail receipt signed by you has been filed in this cause. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in the petition.

**/s/ Kim York, Circuit Clerk, 9/8/2021, 08:40 AM**

Date Issued

Clerk

Further Information:

## Certificate of Mailing

I certify that on 9/8/21 (date), I mailed a copy of this summons and a copy of the petition to Defendant/Respondent CITY OF PLEASANT HILL by registered or certified mail, requesting a return receipt by the addressee only, to the said Defendant/Respondent at the address furnished by Plaintiff/Petitioner.

**/s/ Kim York, Circuit Clerk, 9/8/2021, 08:40 AM**

Date

Clerk



# IN THE 17TH JUDICIAL CIRCUIT COURT, CASS COUNTY, MISSOURI

Judge or Division: <b>WILLIAM B COLLINS</b>	Case Number: <b>21CA-CC00158</b>
Plaintiff/Petitioner: <b>JEFFREY M PEARSON</b>	Plaintiff's/Petitioner's Attorney/Address:  vs.
Defendant/Respondent: <b>CITY OF PLEASANT HILL</b>	Court Address: Cass County Justice Center 2501 West Mechanic <b>HARRISONVILLE, MO 64701</b>
Nature of Suit: <b>CC Other Miscellaneous Actions</b>	(Date File Stamp)

## Summons for Service by Registered or Certified Mail

**The State of Missouri to:** CLINES AUTO BODY  
Alias:

**1107 MATTHES LANE  
PLEASANT HILL, MO 64080**



You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the Plaintiff/Petitioner, or Plaintiff/Petitioner, if pro se, at the above address all within 30 days after the return registered or certified mail receipt signed by you has been filed in this cause. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in the petition.

**/s/ Kim York, Circuit Clerk, 9/8/2021, 08:43 AM**

Date Issued

Clerk

Further Information:

## Certificate of Mailing

I certify that on 9/8/21 (date), I mailed a copy of this summons and a copy of the petition to Defendant/Respondent CLINES AUTO BODY by registered or certified mail, requesting a return receipt by the addressee only, to the said Defendant/Respondent at the address furnished by Plaintiff/Petitioner.

**/s/ Kim York, Circuit Clerk, 9/8/2021, 08:43 AM**

Date

Clerk



# IN THE 17TH JUDICIAL CIRCUIT COURT, CASS COUNTY, MISSOURI

Judge or Division: <b>WILLIAM B COLLINS</b>	Case Number: <b>21CA-CC00158</b>
Plaintiff/Petitioner: <b>JEFFREY M PEARSON</b>	Plaintiff's/Petitioner's Attorney/Address:  vs.
Defendant/Respondent: <b>CITY OF PLEASANT HILL</b>	Court Address: Cass County Justice Center 2501 West Mechanic <b>HARRISONVILLE, MO 64701</b>
Nature of Suit: <b>CC Other Miscellaneous Actions</b>	(Date File Stamp)

## Summons for Service by Registered or Certified Mail

**The State of Missouri to:** **TODD BURRIS (SERGEANT)**  
Alias:

**PLEASANT HILL POLICE DEPT**  
**203 PAUL ST**  
**PLEASANT HILL, MO 64080**



You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the Plaintiff/Petitioner, or Plaintiff/Petitioner, if pro se, at the above address all within 30 days after the return registered or certified mail receipt signed by you has been filed in this cause. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in the petition.

/s/ Kim York, Circuit Clerk, 9/8/2021, 08:46 AM

Date Issued

Clerk

Further Information:

## Certificate of Mailing

I certify that on 9/8/21 (date), I mailed a copy of this summons and a copy of the petition to Defendant/Respondent **TODD BURRIS (SERGEANT)** by registered or certified mail, requesting a return receipt by the addressee only, to the said Defendant/Respondent at the address furnished by Plaintiff/Petitioner.

/s/ Kim York, Circuit Clerk, 9/8/2021, 08:46 AM

Date

Clerk



# IN THE 17TH JUDICIAL CIRCUIT COURT, CASS COUNTY, MISSOURI

Judge or Division: <b>WILLIAM B COLLINS</b>	Case Number: <b>21CA-CC00158</b>
Plaintiff/Petitioner: <b>JEFFREY M PEARSON</b>	Plaintiff's/Petitioner's Attorney/Address:  vs.
Defendant/Respondent: <b>CITY OF PLEASANT HILL</b>	Court Address: Cass County Justice Center 2501 West Mechanic <b>HARRISONVILLE, MO 64701</b>
Nature of Suit: <b>CC Other Miscellaneous Actions</b>	(Date File Stamp)

## Summons for Service by Registered or Certified Mail

**The State of Missouri to:** **DOMINIC MOLENA (POLICE OFFICER)**  
Alias:

**PLEASANT HILL POLICE DEPT**  
**203 PAUL STREET**  
**PLEASANT HILL, MO 64080**



You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the Plaintiff/Petitioner, or Plaintiff/Petitioner, if pro se, at the above address all within 30 days after the return registered or certified mail receipt signed by you has been filed in this cause. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in the petition.

**/s/ Kim York, Circuit Clerk, 9/8/2021, 08:49 AM**

Date Issued

Clerk

Further Information:

## Certificate of Mailing

I certify that on 9/8/21 (date), I mailed a copy of this summons and a copy of the petition to Defendant/Respondent DOMINIC MOLENA (POLICE OFFICER) by registered or certified mail, requesting a return receipt by the addressee only, to the said Defendant/Respondent at the address furnished by Plaintiff/Petitioner.

**/s/ Kim York, Circuit Clerk, 9/8/2021, 08:49 AM**

Date

Clerk



# IN THE 17TH JUDICIAL CIRCUIT COURT, CASS COUNTY, MISSOURI

Judge or Division: <b>WILLIAM B COLLINS</b>	Case Number: <b>21CA-CC00158</b>
Plaintiff/Petitioner: <b>JEFFREY M PEARSON</b>	Plaintiff's/Petitioner's Attorney/Address:  vs.
Defendant/Respondent: <b>CITY OF PLEASANT HILL</b>	Court Address: Cass County Justice Center 2501 West Mechanic <b>HARRISONVILLE, MO 64701</b>
Nature of Suit: <b>CC Other Miscellaneous Actions</b>	(Date File Stamp)

## Summons for Service by Registered or Certified Mail

**The State of Missouri to:** **JEREMY COVER**  
Alias:

**OFFICIAL CAPACITY: MUN. P A**  
**LAUBER MUNICIPAL LAW LLC**  
**250 TUDOR RD**  
**LEES SUMMIT, MO 64086**



You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the Plaintiff/Petitioner, or Plaintiff/Petitioner, if pro se, at the above address all within 30 days after the return registered or certified mail receipt signed by you has been filed in this cause. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in the petition.

**/s/ Kim York, Circuit Clerk, 9/8/2021, 08:51 AM**

Date Issued

Clerk

Further Information:

## Certificate of Mailing

I certify that on 9/8/21 (date), I mailed a copy of this summons and a copy of the petition to Defendant/Respondent **JEREMY COVER** by registered or certified mail, requesting a return receipt by the addressee only, to the said Defendant/Respondent at the address furnished by Plaintiff/Petitioner.

**/s/ Kim York, Circuit Clerk, 9/8/2021, 08:51 AM**

Date

Clerk



# IN THE 17TH JUDICIAL CIRCUIT COURT, CASS COUNTY, MISSOURI

Judge or Division: <b>WILLIAM B COLLINS</b>	Case Number: <b>21CA-CC00158</b>
Plaintiff/Petitioner: <b>JEFFREY M PEARSON</b>	Plaintiff's/Petitioner's Attorney/Address:  vs.
Defendant/Respondent: <b>CITY OF PLEASANT HILL</b>	Court Address: Cass County Justice Center 2501 West Mechanic <b>HARRISONVILLE, MO 64701</b>
Nature of Suit: <b>CC Other Miscellaneous Actions</b>	(Date File Stamp)

## Summons for Service by Registered or Certified Mail

**The State of Missouri to:** **LAUBER MUNICIPAL LAW LLC**  
Alias:

**250 NE TUDOR RD  
LEES SUMMIT, MO 64086**



You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the Plaintiff/Petitioner, or Plaintiff/Petitioner, if pro se, at the above address all within 30 days after the return registered or certified mail receipt signed by you has been filed in this cause. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in the petition.

/s/ Kim York, Circuit Clerk, 9/8/2021, 08:54 AM

Date Issued

Clerk

Further Information:

## Certificate of Mailing

I certify that on 9/8/21 (date), I mailed a copy of this summons and a copy of the petition to Defendant/Respondent **LAUBER MUNICIPAL LAW LLC** by registered or certified mail, requesting a return receipt by the addressee only, to the said Defendant/Respondent at the address furnished by Plaintiff/Petitioner.

/s/ Kim York, Circuit Clerk, 9/8/2021, 08:54 AM

Date

Clerk

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

**1. Article Addressed to:**

Lauber Municipal Law LLC  
250 NE Tudor Rd  
Lee's Summit, MO 64086



9590 9402 6194 0220 8439 42

21CA-CC00158

**2. Article Number (Transfer from service label)**Case 4:21-cv-00743-RK Document 1-2 Filed 10/11/21 Page 43 of 50  
7009 2170 0000 7598 8112**COMPLETE THIS SECTION ON DELIVERY****A. Signature**

X S. Willis C-YD

 Agent Addressee**B. Received by (Printed Name)**

CIVID-19

**C. Date of Delivery**

9/14/21

**D. Is delivery address different from Item 1?**

If YES, enter delivery address below:

 Yes No

21-SMCM-148

**3. Service Type**

- Priority Mail Express®
- Registered Mail™
- Registered Mail Restricted Delivery
- Certified Mail®
- Certified Mail Restricted Delivery
- Collect on Delivery
- Collect on Delivery Restricted Delivery
- Insured Mail
- Restricted Delivery
- Signature Confirmation™
- Signature Confirmation Restricted Delivery

**USPS TRACKING #**



**First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10**

9590 9402 6194 0220 8439 42

**United States  
Postal Service**

- **Sender:** Please print your name, address, and ZIP+4® in this box•

**FILED** CASS CTY CIRCUIT COURT  
2501 W MECHANIC  
HARRISONVILLE, MO 64701

SEP 6 2021

CASS CTY CIRCUIT COURT  
2501 W MECHANIC  
HARRISONVILLE, MO 64701

Case 4:21-cv-00743-RK Document 1-2 Filed 10/11/21 Page 44 of 50

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

## 1. Article Addressed to:

Dominic Molena  
Pleasant Hill Police Dept  
203 Paul Street  
Pleasant Hill, Mo 64080



9590 9402 6194 0220 8439 66

21CA-ccoo158

## 2. Article Number (Transfer from service label)

Case 4:21-cv-00743-RK Document 1-2 Filed 10/11/21 Page 45 of 50

**COMPLETE THIS SECTION ON DELIVERY**

## A. Signature

 Agent Addressee

## B. Received by (Printed Name)

## C. Date of Delivery

D. Is delivery address different from item 1?  Yes

If YES, enter delivery address below:

 No

21-SMCM-146

## 3. Service Type

- Adult Signature
- Adult Signature Restricted Delivery
- Certified Mail®
- Certified Mail Restricted Delivery
- Collect on Delivery
- Collect on Delivery Restricted Delivery
- Insured Mail
- Priority Mail Express®
- Registered Mail™
- Registered Mail Restricted Delivery
- Signature Confirmation™
- Signature Confirmation Restricted Delivery
- Restricted Delivery

USPS TRACKING #



KANSAS CITY 641

SEP 20 2021 PM 3 L

9590 9402 6194 0220 8439 66

United States  
Postal Service

- Sender: Please print your name, address, and ZIP+4® in this box\*

**FILED**  
CASS CTY CIRCUIT COURT  
2501 W MECHANIC  
HARRISONVILLE, MO 64701

SEP 16 2021

CASS COUNTY CIRCUIT CLERK

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Todd BURRIS, Agent  
Pleasant Hill Police Dept.  
203 Paul  
Pleasant Hill, MO 64086



9590 9402 6194 0220 8439 73

21CA-CC00158

2. Article Number (Transfer from service label)

Case 4:21-cv-00743-RK Document 1-2 Filed 10/11/21 Page 47 of 50

**COMPLETE THIS SECTION ON DELIVERY**

## A. Signature

X *Amy Johnson*

 Agent Addressee

## B. Received by (Printed Name)

## C. Date of Delivery

## D. Is delivery address different from item 1?

 Yes

If YES, enter delivery address below:

 No

21-SMCM-145

## 3. Service Type

- Adult Signature
- Adult Signature Restricted Delivery
- Certified Mail®
- Certified Mail Restricted Delivery
- Collect on Delivery
- Collect on Delivery Restricted Delivery

Mail Restricted Delivery  
(0)

- Priority Mail Express®
- Registered Mail™
- Registered Mail Restricted Delivery
- Signature Confirmation™
- Signature Confirmation Restricted Delivery

USPS TRACKING #



KANSAS CITY 64101

14 SEP 2021 F 13 L



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

9590 9402 6194 0220 8439 73

United States  
Postal Service

- Sender: Please print your name, address, and ZIP+4® in this box\*

FILED

SEP 16 2021

CASS CTY CIRCUIT COURT  
2501 W MECHANIC  
HARRISONVILLE, MO 64701

CASS COUNTY CIRCUIT CLERK

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

**1. Article Addressed to:**

City of Pleasant Hill  
City Hall  
203 Paul  
Pleasant Hill, MO 64080



9590 9402 6194 0220 8440 00

ZICA CCOO158

**2. Article Number (Transfer from service label)**

Case 4:21-cv-00743-RK Document 1-2 Filed 10/11/21 Page 49 of 50

**COMPLETE THIS SECTION ON DELIVERY****A. Signature**

X

 Agent Addressee**B. Received by (Printed Name)****C. Date of Delivery****D. Is delivery address different from item 1?**

If YES, enter delivery address below:

 Yes No

21-SMCM-143

**3. Service Type**

- Adult Signature
- Adult Signature Restricted Delivery
- Certified Mail®
- Certified Mail Restricted Delivery
- Collect on Delivery
- Collect on Delivery Restricted Delivery
- Domestic Return Receipt
- Priority Mail Express®
- Registered Mail™
- Registered Mail Restricted Delivery
- Signature Confirmation™
- Signature Confirmation Restricted Delivery

**USPS TRACKING #**



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

9590 9402 6194 0220 8440 00

United States  
Postal Service

**FILED**

SEP 16 2021

CASS CTY CIRCUIT COURT  
2501 W MECHANIC  
HARRISONVILLE, MO 64701

CLERK